

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

IN RE:

SARALYN PACE
SSAN: XXX-XX-4859

Case No. 17-31540-DHW
Chapter 13

Debtor(s)

TRUSTEE'S OBJECTION TO CONFIRMATION

COMES NOW, the Trustee, and pursuant to 11 U.S.C. §1325 objects to confirmation of the debtor(s) plan as filed. As grounds for said objection, the Trustee states as follows:

1. The debtor(s) filed a petition seeking relief under Chapter 13 of the United States Bankruptcy Code on May 31, 2017.
2. The debtor(s) §341 Meeting of Creditors was held July 20, 2017.
3. The debtor(s) overall pay record is 109%.

(X) The debtor(s)' plan fails to meet the best interest of creditors test as discussed at the 341 .

(X) Debtor was to amend the schedules to list her non-filing spouse's actual income and deductions.

(X) Debtor was to amend the schedules to correct the value listed for real property . The value listed in the schedules is still far less than the value listed in the appraisal that Debtor provided .

(X) Debtor was to provide a POTequal to the amount of specially classed debt.

WHEREFORE, the above premises considered, Trustee objects to confirmation of the debtor(s) plan and requests that either confirmation be denied or the case be continued until such time as the above referenced issues have been resolved.

Respectfully submitted this August 14, 2017.

Sabrina L. McKinney
Chapter 13 Standing Trustee

By: /s/Audrey L. Willis

Audrey L. Willis
Staff Attorney

Office of the Chapter 13 Trustee
P.O. Box 173
Montgomery, AL 36101-0173
Phone: (334)262-8371
Fax: (334)262-8599
email: willisa@ch13mdal.com

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have served a copy of the foregoing Trustee's Objection to Confirmation on the parties listed below by either electronic mail or by placing same in the U.S. Mail, postage prepaid and properly addressed this August 14, 2017.

Copy to: DEBTOR(S)
RICHARD D SHINBAUM

/s/Audrey L. Willis

Audrey L. Willis
Staff Attorney